

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 11
)
FTX TRADING LTD., <i>et al.</i> , ¹) Case No. 22-11068 (JTD)
)
Debtors.) (Lead Case)
)
) (Jointly Administered)
)

**CERTIFICATE OF NO OBJECTION REGARDING EMERGENT DEBTOR'S
SECOND MOTION FOR ENTRY OF AN ORDER EXTENDING THE
EXCLUSIVE PERIODS DURING WHICH ONLY THE EMERGENT DEBTOR
MAY FILE A CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES THEREOF**

Jody C. Barillare, as counsel to Emergent Fidelity Technologies Ltd, as debtor and debtor-in-possession (the “Emergent Debtor”), hereby certifies as follows:²

1. On November 20, 2023, the Emergent Debtor moved for entry of an order further extending (a) the exclusive period to file a chapter 11 plan from November 30, 2023 for an additional 120 days through and including March 29, 2024, and (b) the exclusive period to solicit acceptances of a chapter 11 plan from January 29, 2024 for an additional 120 days through and including May 28, 2024 (the “Motion”) [D.I. 4056].

2. The Emergent Debtor attached a notice form to the Motion, setting forth December 5, 2023 at 4:00 p.m. (ET) as the deadline for filing a response to the Motion (the “Objection Deadline”) and December 12, 2023 at 10:00 a.m. (ET) as the hearing date (the “Notice Form”) [D.I. 4056].

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

3. The Emergent Debtor served the Notice Form, the Motion and the exhibit(s) thereto as reflected in the certificate of service annexed to the Motion at D.I. 4056.

4. As of the filing of this certificate, more than twenty-four (24) hours have elapsed since the Objection Deadline, and to the best of the knowledge of the undersigned counsel, no responsive pleading or objection has been filed with the Court on the docket of the above-captioned chapter 11 cases or the chapter 11 case of the Emergent Debtor, or served upon the Emergent Debtor or its counsel.

5. Accordingly, the Emergent Debtor respectfully requests entry of the Proposed Order attached to the Motion and attached hereto as **Exhibit A**.

[Signature page to follow]

Dated: December 6, 2023
Wilmington, DE

MORGAN, LEWIS & BOCKIUS LLP

/s/ Jody C. Barillare

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Possession*